

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D.C.

ORIGINAL

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 98-187
Table of Allotments,	)	RM-9371
FM Broadcast Stations.	)	
(Des Moines, Iowa, and Bennington,	)	
Nebraska)	)	

**RECEIVED**

DEC - 7 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**JOINT COMMENTS OF  
TRIATHLON BROADCASTING OF OMAHA LICENSEE, INC. AND  
SAGA COMMUNICATIONS OF IOWA, INC.**

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Triathlon Broadcasting of Omaha Licensee, Inc., licensee of Station KTNP(FM), Bennington, Nebraska ("Triathlon"), and Saga Communications of Iowa, Inc., licensee of Station KIOA-FM, Des Moines, Iowa ("Saga") (Triathlon and Saga, collectively, the "Petitioners"), by their undersigned counsel, hereby submit the following joint comments in response to the Commission's Notice of Proposed Rule Making, 1998 FCC LEXIS 5320, DA 98-2061 (1998) ("NPRM") in the above-captioned proceeding. The Petitioners reaffirm their interest in the proposal to substitute Channel 227C3 for Channel 227A at Bennington and Channel 227C1 for Channel 227C at Des Moines and to modify their stations' licenses to specify Channel 227C3 and 227C1, respectively. Each Petitioner will file an application for its respective channel, if allotted, and to promptly commence construction and operation of the authorized facilities upon grant of its application.

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As demonstrated in the Joint Petition for Rule Making filed by the Petitioners in this proceeding, which is herein incorporated by reference and a copy of which is attached hereto as Exhibit A, the proposal fully complies with the Commission's rules. Additionally, favorable action would result in service to a much larger area and population than is currently served by the two stations, thereby substantially increasing the number of broadcast signals available to the public and promoting efficient use of the spectrum. Grant of the proposal would result in only minimal loss of service, and none of those losing service as a result of such grant would be left unserved or underserved. Therefore, grant of the proposal would be in the public interest.

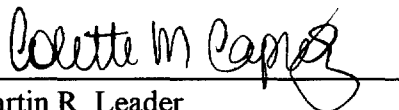
Accordingly, the Petitioners urge the Commission to amend Section 73.202(b) of its Rules and Regulations, the Table of Allotments for FM Broadcast Stations, to substitute Channel 227C3 for Channel 227A at Bennington, Nebraska and simultaneously substitute Channel 227C1 for Channel 227C at Des Moines, Iowa so that the Table of Allotments reads as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Bennington, NE	227A	227C3
Des Moines, IA	227C, 235C, 247C1, 262C, 273C, 298C2	227C1, 235C, 247C1, 262C, 273C, 298C2


The Petitioners also urge the Commission to concurrently modify the licenses for KTNP(FM) and KIOA(FM) to specify Channel 227C3 and Channel 227C1, respectively.

Respectfully Submitted,

**TRIATHLON BROADCASTING OF  
OMAHA LICENSEE, INC.**

By:   
Martin R. Leader  
Colette M. Capretz  
Its Attorneys

**SAGA COMMUNICATIONS OF  
IOWA, INC.**

By:   
Gary S. Smithwick  
Its Attorney

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December 2, 1998

## **EXHIBIT A**

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September 10, 1998

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**DELIVERY VIA COURIER**

Ms. Magalie Romas Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

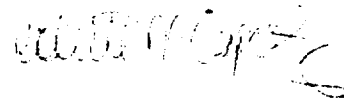
**Re: Petition for Rule Making Seeking Channel Upgrade for  
Station KTNP(FM), Bennington, Nebraska and Channel  
Downgrade for Station KIOA(FM), Des Moines, Iowa**

Dear Ms. Salas:

Transmitted herewith, on behalf of Triathlon Broadcasting of Omaha Licensee, Inc., licensee of Station KTNP(FM), Bennington, Nebraska, and Saga Communications of Iowa, Inc., licensee of Station KIOA(FM), Des Moines, Iowa, are an original and four copies of a Petition for Rule Making seeking the substitution of Channel 227C3 for Channel 227A at Bennington, Nebraska and of Channel 227C1 for Channel 227C at Des Moines, Iowa.

If there should be any questions concerning this matter, please contact the undersigned.

Very truly yours,



Colette M. Capretz

CMC:jch  
Enclosure

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D.C.

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No.
FM Table of Allotments	)	RM-
(Bennington, Nebraska)	)	
(Des Moines, Iowa)	)	

To: Chief, Policy and Rules Division

**PETITION FOR RULE MAKING**

Triathlon Broadcasting of Omaha Licensee, Inc., licensee of Station KTNP(FM), Bennington, Nebraska ("Triathlon"), and Saga Communications of Iowa, Inc., licensee of Station KIOA(FM), Des Moines, Iowa ("Saga") (together with Triathlon, the "Petitioners"), by their undersigned attorneys and pursuant to Section 1.420 of the Commission's rules, hereby jointly request the Commission to initiate a rule making proceeding to amend Section 73.202(b) of its rules, the Table of Allotments for FM Broadcast Stations, to substitute Channel 227C3 for Channel 227A at Bennington, Nebraska and simultaneously substitute Channel 227C1 for Channel 227C at Des Moines, Iowa. Specifically, the Petitioners request that the FM Table of Allotments be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Bennington, NE	227A	227C3
Des Moines, IA	227C, 235C, 247C1, 262C, 273C, 298C2	227C1, 235C, 247C1, 262C, 273C, 298C2

The Petitioners also request that the Commission concurrently modify the licenses for KTNP(FM) and KIOA(FM) to specify Channel 227C3 and Channel 227C1, respectively. In support of this Petition, the Petitioners state as follows:

### **Technical Considerations**

1. As demonstrated by the Engineering Statement attached hereto as Exhibit A, the requested allotment of Channel 227C3 to Bennington, Nebraska complies with the minimum spacing requirements of Section 73.207 and the principal community signal requirements of Section 73.315 of the Commission's rules, except that such an allotment would result in a 24.23 kilometer short spacing to co-channel KIOA(FM) at 227C in Des Moines, Iowa. See Exhibit A.

2. Operation of KIOA(FM) as a Class C1 facility would cure this short spacing deficiency. As demonstrated in the Engineering Exhibit, operation of KIOA(FM) from its present site would comply with the minimum spacing requirements of Section 73.207 as well as the principal community signal requirements of Section 73.315 of the Commission's rules. Id. Saga has agreed to downgrade the facilities of KIOA(FM) to accommodate the proposed upgrade of KTNP(FM), and it respectfully requests the Commission to amend its Table of Allotments and modify KTNP(FM)'s license to allow for such downgrade.

### **Policy Considerations**

3. The proposed upgrade of KTNP(FM) would substantially increase the population served by the station. This increase would mostly occur outside an urbanized area. Significantly, the upgrade would increase the population served by 16.4 percent, representing an additional 89,085 listeners who can receive KTNP(FM)'s signal. Id. The station's service area would be increased by 133.8 percent. Id.

4. In contrast to the substantial gains realized by KTNP(FM)'s upgrade, the requested downgrade for KIOA(FM) would result in minimal loss to the coverage area and population served by the station. Only 1.02 percent of KIOA(FM)'s coverage population, or 6,550 persons, would lose service as a result of the downgrade. Id. The station's service area

would be reduced by only 5.8 percent. While this loss would occur in either rural areas or communities having a population of less than 2,500 persons, the entire loss area would be served by other broadcast radio stations. Id.

5. The Commission has held that expanded service to the public and spectrum efficiency provide significant public interest benefits. See Report and Order in MM Docket No. 85-313, 60 RR 2d 114, 118 (1986). The Commission has also determined on numerous occasions that the substitution of an existing station's channel at one community serves the public interest where the substitution permits the provision of new or expanded service at another community. See, e.g., Marietta, Ohio, and Ravenswood, West Virginia, 2 FCC Rcd 4681 (1987) and Albany, New York, et al., 2 FCC Rcd 400 (1987), 3 FCC Rcd 4681 (1987).

6. The proposed substitution of Channel 227C1 for Channel 227C at Des Moines, Iowa would allow KTNP(FM) to greatly expand its service area with minimal loss to the service area of KIOA(FM). Together, the proposed upgrade and corresponding downgrade will result in service to a much larger area, thereby substantially increasing the number of broadcast signals available to the public and thus promoting efficient use of the spectrum. Thus, the Petitioners' proposal would serve the public interest.

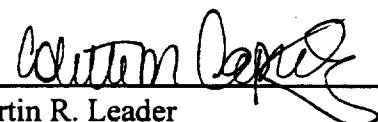
7. Should the Commission make the requested channel substitutions, Saga will immediately tender for filing with the Commission an application seeking a construction permit for the downgraded facilities. Should the Commission grant the construction permit, Saga will immediately construct the downgraded facility. Triathlon will immediately thereafter tender for filing with the Commission an application seeking a construction permit for the upgraded facilities. Should the Commission grant the construction permit, Triathlon will immediately construct the upgraded facility.



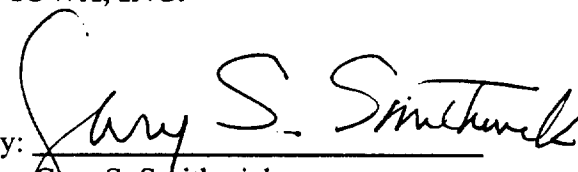
Based upon the foregoing, the Petitioners hereby respectfully request the Commission to initiate the rule making requested herein to amend Section 73.202(b) of the Commission's rules. the Table of Allotments for FM Broadcast Stations, to substitute Channel 227C3 for Channel 227A at Bennington, Nebraska and simultaneously substitute Channel 227C1 for Channel 227C at Des Moines, Iowa. The Petitioners also request that the Commission concurrently modify the licenses for KTNP(FM) and KIOA(FM) to specify Channel 227C3 and Channel 227C1, respectively.

Respectfully Submitted,

**TRIATHLON BROADCASTING OF  
OMAHA LICENSEE, INC.**

By:   
Martin R. Leader  
Colette M. Capretz  
Its Attorneys

**SAGA COMMUNICATIONS OF  
IOWA, INC.**

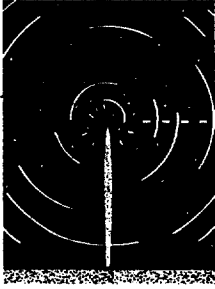
By:   
Gary S. Smithwick  
Its Attorney

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September 10, 1998

**EXHIBIT A**



# WHEELER **BROADCAST** CONSULTING

## ***Engineering Statement***

Petition for Rule Making  
Amend 47 CFR 73.202(b)

Substitute Channel 227 C3 for Channel 227 A at Bennington, NE  
Substitute Channel 227 C1 for Channel 227 C at Des Moines, IA

This consultant has been retained by Triathlon Broadcasting Company for the purpose of preparing technical support to a petition for Rule Making seeking a Class C3 upgrade for KTNP at Bennington, NE and a Class C1 downgrade for KIOA-FM at Des Moines, IA.

### **KTNP - Bennington, NE**

A full search of the Commission's August 29, 1998 FM database reveals that Channel 227 C3 is available at Bennington, NE, in full compliance with the minimum spacing requirements of 47 CFR 73.207 and principal community signal requirements 47 CFR 73.315 save a 24.23 km short spacing to the co-channel operation of KIOA-FM in Des Moines. KIOA-FM has agreed to downgrade its facility from a Class C operation to a Class C1 operation so as to accommodate the upgrade of KTNP at Bennington. The allocation reference site for Channel 227 C3 was chosen by selecting the point nearest to Bennington that meets the minimum spacing requirements of 47 CFR 73.207. Those allocation reference coordinates are:

41° 20' 43" N  
95° 58' 33" W

6025 MARTWAY  
SUITE 112  
MISSION, KS 66202  
913.362.7282  
913.362.7287

A copy of a search of the Commission's August 29, 1998 FM database for Channel 227 C3 is included in this report as Exhibit 1. As shown in Exhibit 1, the proposed KTNP Class C3 reference operation is 212.7<sup>1</sup> km distant from the KIOA-FM main transmitter site and will thus be compliant with the minimum spacing requirement of 211 km for co channel Class C1 and Class C3 radio stations. Exhibit 2 of this report is a digitally generated map that shows the predicted 60 dBu and 70 dBu contours of a model Class C3 operation (25 kW at 100m HAAT) that demonstrates that the entire city of Bennington, NE would receive a signal well in excess of the prescribed 70 dBu minimum. As such, the proposed Channel 227 C3 allocation is compliant with the principal community coverage requirements of 47 CFR 73.315.

#### Comparative Service - Bennington, NE

Exhibit 3 of this report is a digitally generated map that compares the predicted 60 dBu contours of the licensed KTNP Class A operation with the Class C3 operation proposed herein. As shown in Exhibit 3, the predicted 60 dBu contour of the proposed Class C3 operation completely encompasses the predicted 60 dBu contour of the licensed Class A operation. As such, the change in allocation at Bennington would not result in any loss of service to any area that presently receives service from Channel 227 A. The upgrade from Class A to Class C3 would dramatically increase the service area of KTNP. The area encompassed by the 60 dBu contour would increase from its presently licensed 2044.7 km<sup>2</sup> to 4,780.8 km<sup>2</sup>, an increase of 133.8 %. Increases in population served would also be dramatic as it would increase from the presently licensed population of 541,847 persons to 630,932 persons, an increase of 16.4 %. The increases in population and area would come as a result of increases in service to areas beyond the Omaha urbanized area as KTNP serves the entirety of that urbanized area with a 60 dBu signal as presently licensed.

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<sup>1</sup> The proposed 227 C3 allocation is 201.66 km distant from KIOA-FM's auxiliary license, BLH-980410 KG, that license was removed from consideration as it is an auxiliary antenna for emergency use only.

### **KIOAFM - Des Moines, IA**

A search of the Commission's August 29, 1998 FM database finds that KIOA-FM can operate as a Class C1, from its presently licensed site, in full compliance with 47 CFR 73.207. A copy of that search is included in this report as Exhibit 4. Exhibit 5 of this report is a digitally generated map that shows the predicted 60 dBu and 70 dBu contours of a model Class C1 operation (100 kW at 299 m HAAT) from the KIOA-FM site which clearly demonstrates that KIOA-FM would continue to provide the entire city of Des Moines, IA with a predicted signal well in excess of 70 dBu as prescribed by 47 CFR 73.315. Channel 237 C1 thus meets all allocation criterion for Des Moines, IA.

### **Comparative Service - Des Moines, IA**

Exhibit 6 of this report is a digitally generated map that compares the 60 dBu contours of presently licensed KIOA-FM operation with the proposed Class C1 substitution. The area encompassed by the KIOA-FM 60 dBu contour would be reduced from its presently licensed 17,418.8 km<sup>2</sup> to 16,406.4 km<sup>2</sup>, a decrease of 1,012.4 km<sup>2</sup> or 5.8%. The population served by KIOA-FM would also be reduced from its presently licensed coverage of 644,146 persons to 637,596 persons. That decrease of 6,550 persons represents a decrease of only 1.02% from the presently licensed operation. An additional digitally generated map was created and the 60 dBu contours of additional FM radio stations as well as the 0.5 mV/m<sup>2</sup> contours of additional AM radio stations whose contours intersect the loss area<sup>3</sup> were plotted so as to assure that no area contained within the loss area created as a result of the KIOA-FM downgrade would be either unserved or under served. A copy of that map is included in this report as Exhibit 7.

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<sup>2</sup> The area contained within the loss area of KIOA-FM is completely comprised of either rural areas or communities with a population of less than 2,500 persons. As such, in accordance with 47 CFR 73.182(d), the 0.5 mV/m contour was used in the determination of service contours for additional AM radio stations.

<sup>3</sup> The additional radio stations shown in Exhibit 7 do not represent the entirety of additional services in the loss area. So as to minimize the clutter on the exhibit only FM radio stations whose transmitters are located within 100 km of KIOA-FM and AM radio stations whose transmitters are located within 35 km of KIOA-FM were included. Radio stations whose contours did not intersect with any part of the loss area were removed from the exhibit. The 0.5 mV/m contour of WHO (AM) completely encompasses the map used in Exhibit 7 and, as such, only the transmitter site was shown on the exhibit.

### **Conclusion**

The substitution proposed in this action is clearly in the public interest as it will provide an additional aural service to a population of 89,085 persons in the area around Bennington, NE while resulting in a loss of service to only 6,550 persons in the area around Des Moines, IA. The licensee of KIOA-FM has agreed to the substitution of Channel 227 C1 for Channel 227 C at Des Moines. The entire area encompassed in the loss area for KIOA is served by 5 or more aural services and, as such, is not under served. Upon adoption of this request both KTNP and KIOA-FM will promptly file applications for the requested facilities and, upon grant of those applications, will promptly construct and operate those facilities. It is therefore respectfully requested that the FM Table of Allotments, 47 CFR 73.202(b) be amended as follows:

Community	Present	Proposed
Bennington, NE	227 A	227 C3
Des Moines, IA	227 C, 235 C, 247 C1, 262 C, 273 C, 298 C2	227 C1, 235 C, 247 C1, 262 C, 273 C, 298 C2

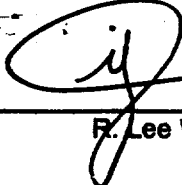
### **Methodology**

All FM contours used in this report were calculated in accordance with the provisions of 47 CFR 73.313 and were based on a study of 360 equally spaced radials. AM contours were predicted based upon the equivalent distance method as set forth in 47 CFR 73.183. All conductivity information was gleaned from a digital model of the M-3 conductivity maps. Area determinations were made by utilizing an arithmetic average of the 360 contours and population determinations were made by employing a digital overlay of minor civil subdivision maps. The population counting algorithm employs the block centroid retrieval methodology and extracts data from the PL-94-171, 1990 US Census database.

### **Certification**

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

8/31/98  
Date

  
R. Lee Wheeler

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

KTNP  
Allocation Reference Site

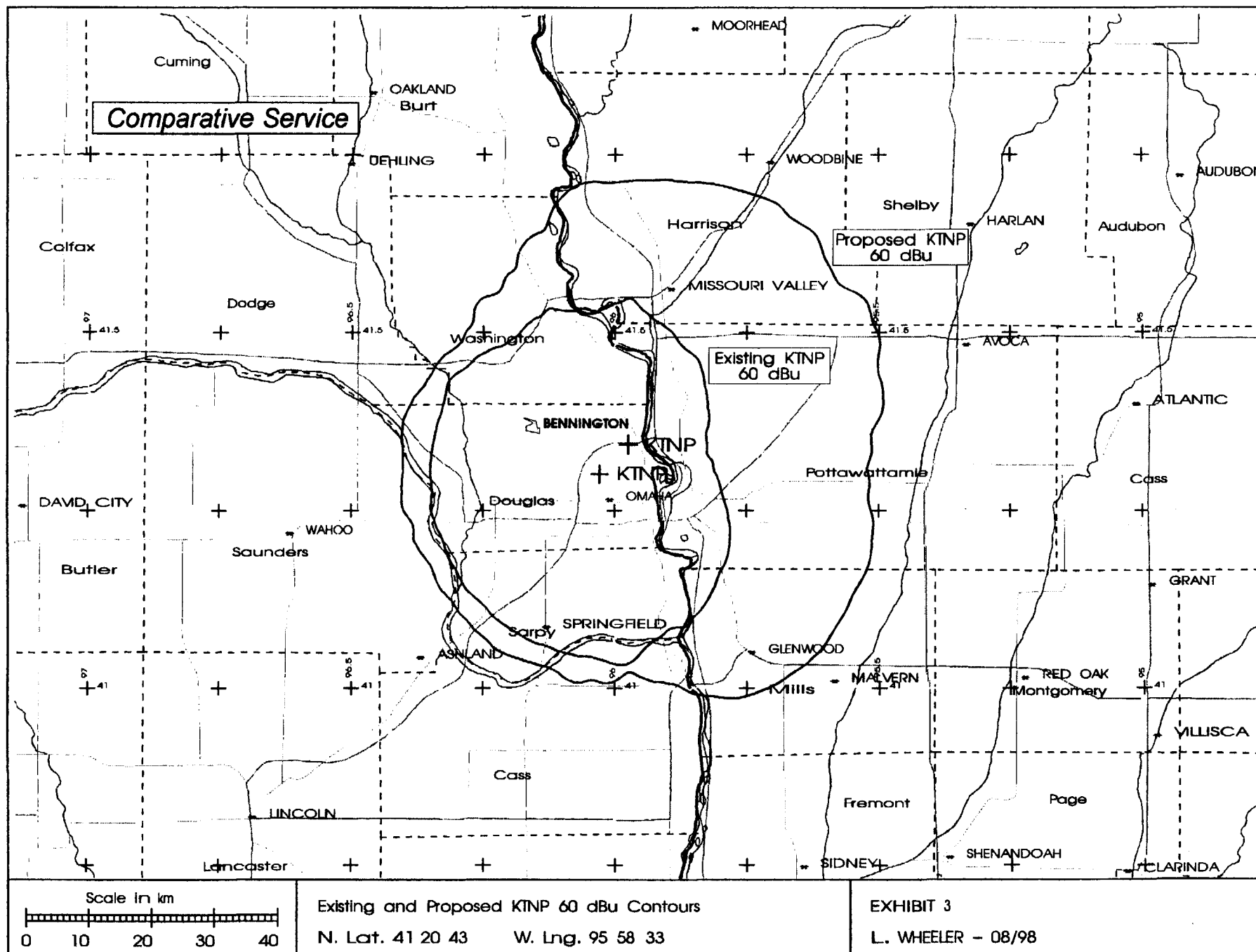
REFERENCE	CLASS C3	DISPLAY DATES
41 20 43 N		DATA 08-29-98
95 58 33 W	Current rules spacings	SEARCH 08-31-98
----- CHANNEL 227 - 93.3 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KTNP	227A	Bennington	NE	223.9	6.30	142.0	-135.70 *
LI ZCN	41 18 16	96 01 41	3.600 kW	130M	3.9	88.3	
	Triathlon Broadcasting Compan				BLH910613KA		
KIOAFM	227C	Des Moines	IA	82.4	201.66	237.0	-35.34 * /
LI CN	41 33 31	93 34 45	2.800 kW	60M	125.3	147.3	
	Saga Communications of Iowa,				BLH980410KG		
KIOAFM	227C	Des Moines	IA	80.5	212.77	237.0	-24.23 * /
LI CN	41 37 54	93 27 24	100.000 kW	324M	132.2	147.3	
	Saga Communications of Iowa,				BLH870210KD		
KKOT	228C1	Columbus	NE	279.3	144.00	144.0	0.00 *
LI CN	41 32 28	97 40 45	100.000 kW	299M	89.5	89.5	
	Three Eagles of Columbus, Inc				BLH910822KC		
KTRX	228C3	Tarkio	MO	143.8	113.36	99.0	14.36
LI CN	40 31 11	95 11 03	11.000 kW	149M	70.4	61.5	
	CSN International				BLH960821KB		
>From Channel 228A per D92-219							
KTGL	225C1	Beatrice	NE	216.2	113.54	76.0	37.54
LI CN	40 31 06	96 46 07	100.000 kW	247M	70.6	47.2	
	Triathalon Broadcasting of Li				BLH871019KB		
KKRL	229C1	Carroll	IA	48.6	120.16	76.0	44.16
LI CN	42 03 14	94 53 06	100.000 kW	91M	74.7	47.2	
	Carroll Broadcasting Company				BLH830810AG		

- 1 Auxiliary License  
2 To 227 C1







WHEELER BROADCAST CONSULTING  
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KIOA  
Class C1

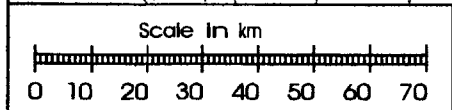
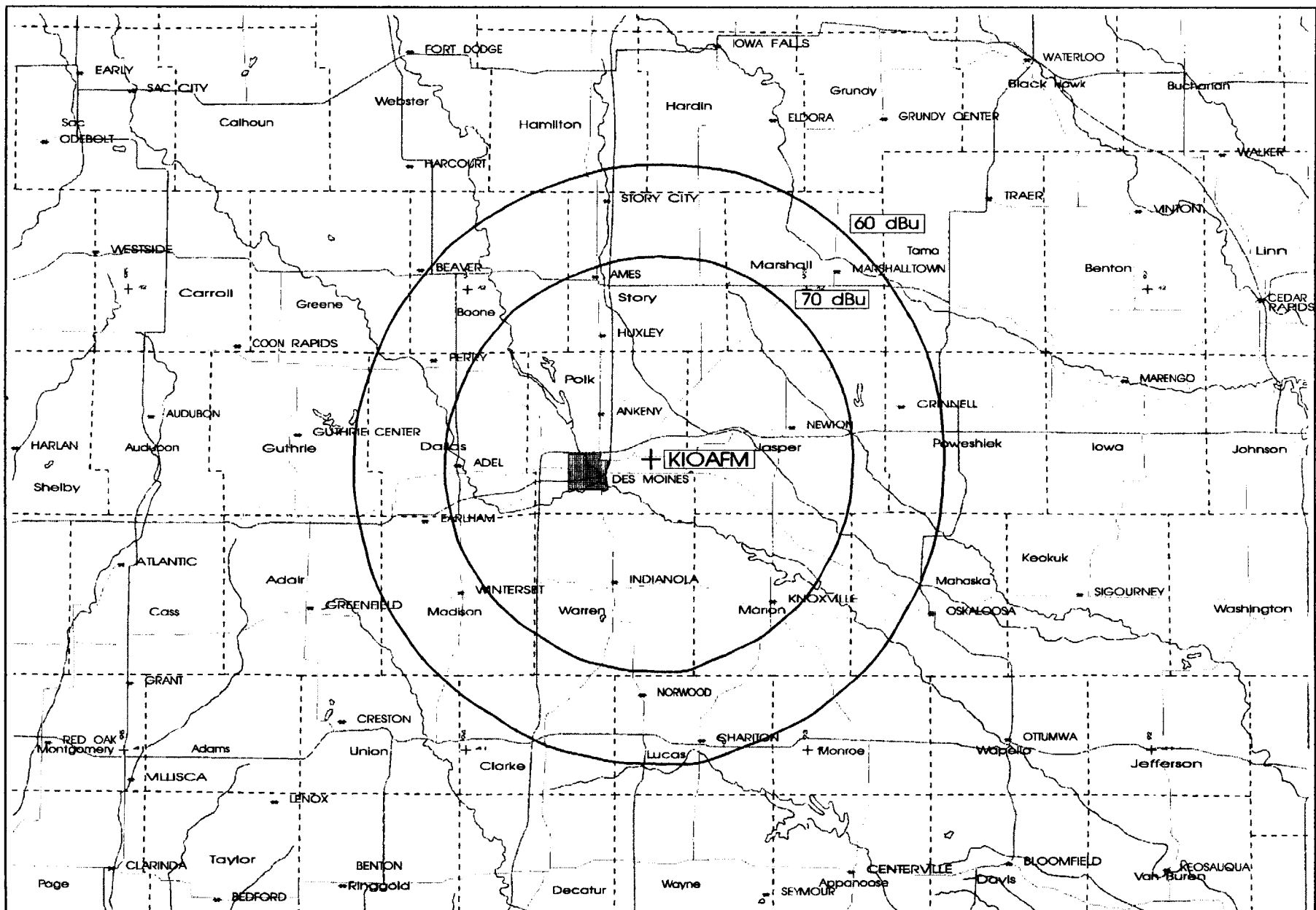
REFERENCE	CLASS C1	DISPLAY DATES
41 37 54 N		DATA 08-29-98
93 27 24 W	Current rules spacings	SEARCH 08-31-98
----- CHANNEL 227 - 93.3 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KIOAFM	227C	Des Moines	IA	0.0	0.00	270.0	-270.00 *
LI CN	41 37 54	93 27 24	100.000 kW	324M	0.0	167.8	
	Saga Communications of Iowa,				BLH870210KD		
KIOAFM	227C	Des Moines	IA	231.5	13.04	270.0	-256.96 *
LI CN	41 33 31	93 34 45	2.800 kW	60M	8.1	167.8	
	Saga Communications of Iowa,				BLH980410KG		
KLTFM	281C	Ames	IA	309.2	47.85	41.0	6.85
LI CN	41 54 09	93 54 15	100.000 kW	308M	29.7	25.5	
	Bunce Broadcasting Corporatio				BLH861229KC		
KTNP	227A	Bennington	NE	261.2	217.86	200.0	17.86
LI ZCN	41 18 16	96 01 41	3.600 kW	130M	135.4	124.3	
	Triathlon Broadcasting Compan				BLH910613KA		
WIZMFM	227C	La Crosse	WI	34.5	296.04	270.0	26.04
LI CN	43 48 23	91 22 04	100.000 kW	311M	184.0	167.8	
	Family Radio, Inc.				BLH830527AE		
AD224	224C3	Ottumwa	IA	132.6	103.20	76.0	27.20
AD	41 00 00	92 33 10	0.000 kW	0M	64.1	47.2	
	Northern Broadcast Group				RM8751 960116		
>Site Restriction 12.2km West							
ALOPEN	224C3	Ottumwa	IA	125.9	103.38	76.0	27.38
AL N	41 05 00	92 27 30	0.000 kW	0M	64.3	47.2	
	89-365						
>Site Restricted-Effective 9-10-90-Reserved for KTW A per D89-365							
DE224	224C3	Ottumwa	IA	125.9	103.38	76.0	27.38
DE	41 05 00	92 27 30	0.000 kW	0M	64.3	47.2	
	Northern Broadcast Group				RM8751 960116		
KTWA.A	224C2	Ottumwa	IA	129.0	106.67	79.0	27.67
AP ZCN	41 01 29	92 28 09	50.000 kW	97M	66.3	49.1	
	Gillbro Communications Limite				BPH960322IC		
>One-Step Application from Channel 224A							
ALOPEN	224C2	Ottumwa	IA	128.9	107.67	79.0	28.67

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

CLASS C1

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AL	N 41 01 11	92 27 33	0.000 kW	OM	66.9	49.1	
>Reserved for KTTA per One-Step Application BPH-960322IC							
KTTA	224A	Ottumwa	IA	129.0	106.67	75.0	31.67
LI	CN 41 01 29	92 28 09	3.000 kW	100M	66.3	46.6	
Gillbro Communications Limite					BLH860619KA		
>*To channel 224C3 per D89-365-*To Channel 224C2 per One-Step Applic							
>BPH-960322IC							
KMXV	227C	Kansas City	MO	197.4	303.86	270.0	33.86
LI	CN 39 00 57	94 30 24	100.000 kW	325M	188.9	167.8	
Regent Licensee of Kansas Cit					BLH870318KG		
WIZMFM	227C	La Crosse	WI	36.5	304.71	270.0	34.71
LI	CN 43 48 44	91 11 59	100.000 kW	165M	189.4	167.8	
Family Radio, Inc.					BLH830527AD		
>** This license is for an AUXILIARY facility of WIZM-FM, La Crosse,							
KKRL	229C1	Carroll	IA	292.1	127.57	82.0	45.57
LI	CN 42 03 14	94 53 06	100.000 kW	91M	79.3	51.0	
Carroll Broadcasting Company					BLH830810AG		
KTRX	228C3	Tarkio	MO	230.1	190.59	144.0	46.59
LI	CN 40 31 11	95 11 03	11.000 kW	149M	118.4	89.5	
CSN International					BLH960821KB		
>From Channel 228A per D92-219							



KIOAFM 227C1 100kW 299 m HAAT  
N. Lat. 41 37 54 W. Lng. 93 27 24

EXHIBIT 5  
L. WHEELER - 08/98



